STATE OF SOUTH CAROLINA))	BEFORE THE PUBLIC SERVICE COMMISSION DOCKET NO: 2011-317-WS
In re: Application of Kiawah Island Utility Company for Adjustment of Rates)))	Petition to Intervene and Protest

Petitioner Kiawah Island Community Association, Inc. ("Petitioner" or "KICA") would show this Commission the following:

- 1. This is a Petition to Intervene submitted pursuant to S.C. Code Regs. 103-825(3) and a Protest submitted pursuant to S.C. Code Regs. 103-827.
- 2. Petitioner is a not-for-profit corporation formed under the laws of the State of South Carolina located at 23 Beachwalker Drive, Kiawah Island, SC 29455.
- 3. Petitioner is directly affected by this proposed rate increase in that the Petitioner is a significant user of the applicant's services.
- 4. Because the Petitioner does not have sufficient information on the abovecaptioned application for adjustment of rates, it protests the rate adjustment at this time.
- 5. Petitioner further requests that this Commission grant it leave to intervene and participate in all proceedings on this docket, including notice of all further matters involving this proceeding. Petitioner expects its presentation to require approximately three hours.
- 6. Petitioner further requests that this Commission hold all hearings involving this proceeding in the service area of the Kiawah Island Utility Company, with the Petitioner's preference being the Kiawah Island Municipal Center, 21 Beachwalker Drive, Kiawah Island, SC 29455.

Wherefore, the Petitioner respectfully requests the above-mentioned relief and any other and further relief that this Commission may deem just and proper.

/s/ Jason Scott Luck
John P. Seibels, Jr.
jseibels@seibelsfirm.com
Jason Scott Luck
jluck@seibelsfirm.com
SEIBELS LAW FIRM, P.A.
127 King Street, Suite 100
Charleston, SC 29401
843.722.6777 (O)
843.722.6781 (F)
Attorneys and Authorized
Representatives for Petitioner
Kiawah Island Community
Association, Inc.

Joe Bunting
joe.bunting@kica.us
Chief Operating Officer
Kiawah Island Community
Association
23 Beachwalker Drive
Kiawah Island, SC 29455
843.768.9194 (O)
843.243.8789 (F)
Authorized Representative for
Petitioner Kiawah Island
Community Association, Inc.

Charleston, South Carolina 16 September 2011

CERTIFICATE OF SERVICE 2011-317-WS

I, the undersigned, do hereby certify that I have this 16th day of September, 2011, I filed a copy of Petitioner KICA's Petition to Intervene and Protest via the Public Service Commission of South Carolina's electronic filing system, and on the same day emailed and mailed paper copies via the U.S. Mail, first class, postage prepaid, to the following addresses:

Michael A. Molony, Esquire Young Clement Rivers, LLP 28 Broad Street P.O. Box 993 Charleston, SC 29402 mmolony@ycrlaw.com

G. Trenholm Walker, Esquire Pratt-Thomas, Pearce, Epting, & Walker P.O. Drawer 22247 Charleston, SC 29413 gtw@p-tw.com

Shealy Boland Reibold, Esquire Counsel, Office of Regulatory Staff 1401 Main St., Suite 900 Columbia, SC 29201 sreibol@regstaff.sc.gov

Shannon Bowyer Hudson, Esquire Counsel, Office of Regulatory Staff 1401 Main St., Suite 900 Columbia, SC 29201 shudson@regstaff.sc.gov

/s/ Jason Scott Luck